

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

SALSGIVER, INC.,

Bankruptcy No. 18-20803-TPA

Debtor.

Chapter 11

SALSGIVER, INC.,

Document No.

Movant,

**Related to Doc. Nos. 392, 393, 394,
395**

vs.

NO RESPONDENT.

**MOTION FOR LEAVE TO AMEND PLAN OF REORGANIZATION,
DISCLOSURE STATEMENT AND PLAN SUMMARY AND FURTHER,
TO DEEM EXISTING REDLINE ORDER AS MOOT**

AND NOW, comes Salsgiver, Inc., the Debtor in the instant Chapter 11 Case, by and through its undersigned Counsel, and files this **MOTION FOR LEAVE TO AMEND PLAN OF REORGANIZATION, DISCLOSURE STATEMENT AND PLAN SUMMARY AND FURTHER, TO DEEM EXISTING REDLINE ORDER AS MOOT** as follows:

1. The Movant is Salsgiver, Inc., the Debtor in the instant Chapter 11 Case.
2. On December 9, 2019, the Debtor filed an Amended Chapter 11 Plan (Doc. 392), an Amended Disclosure Settlement (Doc. 393) and an Amended Summary of Plan (Doc. 394).
3. On December 11, 2019, this Honorable Court entered an Order (Doc. 395) which provided that the Debtor was to file redlined versions of its Amended Plan, Amended Disclosure Statement and Amended Plan Summary on or before December 23, 2019.
4. In the time since the Debtor filed its amended plan documents on December 9, 2019, the Debtor has engaged in multiple mediations, all of which have resulted in settlements.

5. As the Court is aware, the Debtor had amicably resolved various other claims prior to the most recently mediated settlements.

6. The Debtor further had previously filed various claim objections which had resulted in the disallowance of certain claims asserted against the Debtor.

7. The most recently mediated settlements achieved since the filing of Debtor's amended plan documents on December 9, 2019 represent the last adversary proceedings and claim objections filed by the Debtor and its affiliates (which are also Debtors in this Honorable Court) still pending before the Court.

8. The most recently settled claims involved significant claims against the Debtor's Estate and those of the affiliated Debtors. Certain settlements also resulted in assumed executory contracts with updated terms. With said matters having been settled, the Debtor and its affiliates now have certainty and predictability regarding exact amounts owed and the timing regarding payment of said amounts. Debtor further knows which executory contracts are to be retained and the benefits and responsibilities associated with same.

9. In light of the foregoing, it is respectfully requested that this Honorable Court grant leave to the Debtor to file new amended plan documents, which include the updated information related to the recent settlement agreements reached, on or before January 13, 2020.

10. The certainty and predictability achieved via recent settlements will enable the Debtor and its affiliates to file less speculative plans based upon concrete obligations rather than estimates based upon expected/hoped for outcomes. This will benefit both the Debtor and its creditors in evaluating the plan.

11. If the Court grants leave as requested above, it is further submitted that the filing of redlined versions of the December 9, 2019 plan documents would serve no purpose and would be moot in light of the further amendments to be made.

WHEREFORE, it is respectfully requested that this Honorable Court enter an Order granting leave to the Debtor to file new amended plan documents on or before January 13, 2020 and further deeming that the filing of redlined versions of Debtor's December 9, 2019 amended plan documents is no longer necessary.

Respectfully Submitted,

Date: December 23, 2019

/s/ Robert O Lampl

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NO RESPONDENT.

CERTIFICATE OF SERVICE

Robert O Lampl, John P. Lacher, David L. Fuchs and Ryan J. Cooney hereby certify, that on the 23rd day of December, 2019, a true and correct copy of the foregoing **MOTION FOR LEAVE TO AMEND PLAN OF REORGANIZATION, DISCLOSURE STATEMENT AND PLAN SUMMARY AND FURTHER, TO DEEM EXISTING REDLINE ORDER AS MOOT** was served upon the following (*via Electronic Service and/or FedEx and/or fax*):

Office of the United States Trustee
Suite 970 Liberty Center
1001 Liberty Avenue
Pittsburgh, PA 15222

Date: December 23, 2019

/s/ Robert O Lampl
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